

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, THE
EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF THE COMMONWEALTH OF
PUERTO RICO, AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED TRANSLATION AND
REQUEST FOR WITHDRAWAL OF EXHIBIT**

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¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

TO THE HONORABLE DISTRICT COURT:

COME NOW, Ivelisse Calderón-Alibrán and Carlos Torres Viada (collectively, “Moving Parties”) as parties in interest, by and through the undersigned counsel, and respectfully state as follows:

1. On June 13, 2022, the Moving Parties submitted their *Urgent Motion for Extension of Administrative Expense Claim Bar Date and Proper Service of Process and Request to be Heard*. [**Docket No. 21217**] (“Urgent Motion”). The *Urgent Motion* had various exhibits. Of those, Exhibits 1 and 3 were filed in their original Spanish language.
2. On the same date, the Moving Parties filed a *Motion for Leave to file Documents in the Spanish Language and Request for an Extension of time to File Certified Translation* (“Motion for Leave”). [**Docket Entry 21220**] On June 15, 2022, this Honorable Court issued an order granting leave to file the translations by July 5, 2022, at 5:00 pm. [**Docket Entry 21245**]
3. On June 23, 2022, Debtors filed an *Urgent Consensual Motion for Extension of Deadlines* (“Consensual Motion”). [**Docket Entry 21332**] On June 24, 2022, this Honorable Court granted the *Consensual Motion*, moving the deadlines for the Debtors’ responses to July 11, 2022, and the Moving Parties’ replies to July 18, 2022. [**Docket Entry 21340**]
4. Notwithstanding the above, due to the financial burden of obtaining certified translations, the Moving Parties have been unable to provide the translations by this Court’s deadline. At present, the Moving Parties have managed to commission the certified translation of Exhibit 1 of the *Urgent Motion*. Nevertheless, this translation is not yet ready, and the retained translators need time to execute the commissioned work. Additionally, the Moving Parties do not have the means to obtain the certified translation of Exhibit 3 of the *Urgent Motion*.

5. In view of the foregoing, the Moving Parties respectfully request additional fifteen (15) days to file the certified translation of Exhibit 1 of the *Urgent Motion*, until Monday, July 20th, 2022. Moreover, the Moving Parties request this Court grant leave to withdraw Exhibit 3 of the *Urgent Motion*. Such withdrawal does not affect the claims of the *Urgent Motion*, as this document duplicates the information contained in Exhibit 4 which is already in English.

WHEREFORE, the Moving Parties respectfully request that this Honorable Court grants this Motion and allow extension of time of fifteen (15) days, expiring on July 20th, 2022, to file the corresponding certified translation of Exhibit 1 and leave to withdraw Exhibit 3.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, this 5th day of July 2022.

WE HEREBY CERTIFY that on this same date we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all participants and attorneys of record.

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